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Plaintiffs' Liaison Counsel

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

R.B. and A.B. v. Snap Inc., 4:24-cv-04083;

K.G. and N.F. v. Snap Inc., et al., 4:24-cv-04086;

K.K. and K.A. v. Meta Platforms, Inc. et al., 4:24-cv-04425;

K.K. and C.K. v. Meta Platforms, Inc. et al., 4:24-cv-04426;

C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al., 4:24-cv-04495;

M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al., 4:24-cv-04578;

K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al., 4:24-cv-05161;

S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al., 4:24-cv-05178;

C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al., 4:24-cv-05369;

**DECLARATION OF JENNIE LEE
 ANDERSON IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS TO THE DECLARATION OF
 JENNIE LEE ANDERSON IN SUPPORT OF
 PLAINTIFFS' ELEVENTH
 CONSOLIDATED *EX PARTE*
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS *AD LITEM***

1 *C.D., on behalf of C.F. v. Meta Platforms,*
 2 *Inc. et al., 4:24-cv-06506;*

3 *J.H., filed on behalf of minor M.H. v. Meta*
 4 *Platforms, Inc., et al., 4:24-cv-06613;*

5 *B.B., filed on behalf of minor O.B. v. Meta*
 6 *Platforms, Inc., 4:24-cv-06139;*

7 *L.J. and B.J. v. Meta Platforms, Inc. et al.,*
 8 *4:24-cv-06722;*

9 *J.G., individually and on behalf of Z.J. v.*
 10 *Meta Platforms, Inc. et al., 4:24-cv-06723;*

11 *B.D., on behalf of Z.H. v. Meta Platforms,*
 12 *Inc. et al., 4:24-cv-06727;*

13 *D.C., on behalf of T.S. v. Meta Platforms, Inc.*
 14 *et al., 4:24-cv-06728;*

15 *D.C. and E.B v. Snap Inc. et al., 4:24-cv-*
 16 *06729;*

17 *R.Z., filed on behalf of minor C.Z. v. Meta*
 18 *Platforms, Inc. et al., 4:24-cv-06641.*

19 I, Jennie Lee Anderson, do hereby declare and state as follows:

20 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
 21 to practice before the courts of the State of California and in the Northern District of California. I
 22 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
 23 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
 24 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
 25 make this declaration of my own personal knowledge and, if called as a witness, I could and
 26 would testify competently to the matters stated below.

27 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
 28 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Eleventh
 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative
 Motion to Seal").

3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on

February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Declaration").

4. True and correct copies of the following Exhibits to the Anderson Declaration are as follows and attached hereto:

- *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083 (Exhibit 1)
- *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086 (Exhibit 2);
- *K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425 (Exhibit 3);
- *K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426 (Exhibit 4);
- *C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495 (Exhibit 5);
- *M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578 (Exhibit 6);
- *K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161 (Exhibit 7);
- *S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178 (Exhibit 8);
- *C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369 (Exhibit 9);
- *C.D., on behalf of C.F. v. Meta Platforms, Inc. et al.*, 4:24-cv-06506 (Exhibit 10);
- *J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613 (Exhibit 11);
- *B.B., filed on behalf of minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139 (Exhibit 12);
- *L.J. and B.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06722 (Exhibit 13);
- *J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723 (Exhibit 14);
- *B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al.*, 4:24-cv-06727 (Exhibit 15);

- *D.C., on behalf of T.S. v. Meta Platforms, Inc. et al.*, 4:24-cv-06728 (Exhibit 16);
- *D.C. and E.B v. Snap Inc. et al.*, 4:24-cv-06729 (Exhibit 17);
- *R.Z., filed on behalf of minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641 (Exhibit 18).

5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a standing stipulation that the individual applications seeking appointment of guardians *ad litem* in this litigation may be filed under seal. Defendants also confirmed that, in so stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Dated: October 25, 2024

Respectfully submitted,

/s/Jennie Lee Anderson
Jennie Lee Anderson

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